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Utilities Authority

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF JERSEY**

**In Re:**

**JAMES M. MASSA,**

**Debtor.**

**Chapter 13**

**Case No.: 19-28865 (MBK)**

**LIMITED NOTICE OF APPEARANCE, REQUEST FOR NOTICES  
AND SERVICE OF PAPERS, AND REQUEST FOR MATRIX ENTRY**

**TO: THE UNITED STATES BANKRUPTCY COURT  
AND ALL INTERESTED PARTIES**

**PLEASE TAKE NOTICE** that the Old Bridge Municipal Utilities Authority (the “OBMUA”) files this Limited Notice of Appearance through its attorneys, Scarinci & Hollenbeck, LLC, 1100 Valley Brook Avenue, P.O. Box 790, Lyndhurst, New Jersey 07071-0790 (attention: Joel Glucksman, Esq.), pursuant to Bankruptcy Rule 9010, and requests that all notices (including those required by Bankruptcy Rule 2002) in this case or in any related adversary proceeding be mailed to the undersigned at the address set forth below.

**PLEASE TAKE FURTHER NOTICE** that request is hereby also made for service on the undersigned of copies of all papers (and/or electronic filings), including but not limited to reports, pleadings, motions, applications or petitions, schedules, plans, disclosure statements, and answering or reply papers filed in the above-captioned case or in any related adversary proceeding,

by mailing a copy of each, unless otherwise directed by the Court, to the individual identified hereinbelow.

**PLEASE TAKE FURTHER NOTICE** that the OBMUA requests that the following be added to the Court's Mailing Matrix and/or any master service list maintained in this case:

Joel R. Glucksman (JG 6443)  
SCARINCI & HOLLENBECK, LLC  
1100 Valley Brook Avenue, P.O. Box 790  
Lyndhurst, New Jersey 07071-0790  
[jglucksman@sh-law.com](mailto:jglucksman@sh-law.com)

**PLEASE TAKE FURTHER NOTICE** that the OBMUA does not intend this Limited Notice of Appearance to constitute a waiver of any and all sovereign or other immunities to which the OBMUA is and/or may be accorded and/or entitled, and the OBMUA does not waive, expressly or impliedly, any and all claims of immunity as a result of filing this Limited Notice of Appearance. This Limited Notice of Appearance also should not be construed as an admission that the OBMUA is a party in interest, a creditor, or otherwise holds any particular relationship with Debtor, nor should it be construed as an admission of this Court's jurisdiction over the OBMUA. The OBMUA retains all rights in that respect, including the right to assert its sovereign immunity in any applicable matter.

**PLEASE TAKE FURTHER NOTICE** that the OBMUA also does not intend this Limited Notice of Appearance, nor any subsequent appearance, pleading, claim, or suit, to waive any and/or all other rights to which the OBMUA may be entitled including, but not limited to: (i) the right to have final orders in noncore matters entered only after de novo review by District Judge; (ii) the right to trial by jury in any proceeding related to this case, (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (iv) any rights, claims, actions, defenses, setoffs, or recoupments to which the

OBMUA is or may be entitled under agreements, in law or in equity all of which rights, claims, actions, defenses, setoffs, and recoupments are hereby expressly reserved.

**SCARINCI & HOLLENBECK, LLC**  
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Attorneys for the Old Bridge Municipal Utilities  
Authority

By: /s/ Joel R. Glucksman  
JOEL R. GLUCKSMAN, ESQ.

DATED: February 6, 2020